

Required Provider Qualification (PQ) Training on Common Health Conditions That May Be Associated with Preventable Deaths

ODP Announcement 22-108

AUDIENCE:

- Providers that render any of the following services, or who are in the process of becoming qualified to render any of the following services:
 - Residential Habilitation
 - Life Sharing
 - Supported Living
- Administrative Entities (AEs)

PURPOSE:

The purpose of this announcement is to provide guidance and information relating to a new qualification requirement that has been added to the Residential Habilitation, Life Sharing, and Supported Living services (“residential services”). The Office of Developmental Programs (ODP) anticipates that the new qualification requirement will become effective between mid-October and late December of 2022 based on feedback from the Centers for Medicare and Medicaid Services (CMS). This guidance is being released prior to CMS approval of the Consolidated and Community Living waiver renewals and the Adult Autism

Waiver (AAW) amendment to give providers sufficient time to implement this new requirement.

DISCUSSION:

There are several major health concerns seen frequently in individuals with an intellectual disability, developmental disability, or autism which if untreated can progress to serious illness or death. These conditions are commonly referred to as the Fatal Five and include aspiration, bowel obstruction, dehydration, seizure, and infection/sepsis. These conditions are often preventable or at least able to be managed effectively with attentive care. Deaths associated with these conditions are often preventable.

ODP is adding a new provider qualification to the **Consolidated, Community Living, and Adult Autism Waivers** for residential services. All provider staff who will spend any time alone with a participant during the provision of residential services must complete a “Department approved training on the common health conditions that may be associated with preventable deaths in people with an intellectual or developmental disability.” This applies to provider staff that are direct employees of an agency, contracted employees of an agency, or volunteers.

A list of Department approved trainings to meet this requirement is available at <https://www.myodp.org/mod/page/view.php?id=40125>. This page lists each organization with currently approved training(s). The approved training(s) that must be completed for the organization are listed next to the “details” bullet underneath the organization. To meet the qualification requirement, staff are required to complete approved training(s) through **one organization** listed.

This list may be updated if additional trainings are approved. Please note that only the trainings that appear on the current list of approved trainings are acceptable to meet the qualification requirement. No other training content will be accepted.

Providers are reminded that:

- Documentation of training completion must be maintained in accordance with [55 Pa.Code § 6100.141 \(Relating to Training Records\)](#).
- This training may be counted towards the annual training hour requirements specified at [55 Pa.Code § 6100.143 \(Relating to Annual Training\)](#).
 - Although this training is not required to be taken annually, ODP recommends that the content be reviewed periodically to maintain competency in recognizing the conditions.
 - The training courses listed may contain guidance that differs from regulatory requirements for reporting, investigating, and responding to incidents that arise from the common health conditions covered in the course. When this occurs, staff must adhere to regulatory requirements.
 - The training courses listed above may contain guidance that differs from a provider's internal policies for reporting, investigating, and responding to incidents that arise from the common health conditions covered in the course. When this occurs, staff should adhere to the provider's internal policies.

Current Providers

Providers that are currently qualified to render residential services must ensure that provider staff complete the required training as follows:

- Provider staff hired before **the effective date of the waiver changes** must complete the required training no later than **three months after the effective date of the waiver changes**.

- **Provider staff hired on or after the effective date of the waiver changes must complete the required training before working alone with an individual.** For purposes of this requirement, a provider staff is “working alone” when they are not in the line of sight of other persons who have received Department-approved training on the common health conditions that may be associated with preventable deaths in people with an intellectual disability, developmental disability, or autism. It is the responsibility of the provider to demonstrate the date provider staff worked alone with an individual.
- If a provider staff has already taken one of the Department approved trainings prior to the effective date of the waiver changes, the provider staff does not need to take the training again to meet qualifications.

For current providers, AEs or ODP (for the AAW) will verify that residential services staff received the required training **the next time the provider goes through the requalification process.**

New Providers

Beginning on the effective date of the waiver changes, all newly enrolled residential services providers must ensure that all provider staff complete the required training before they can work alone with individuals.

QUESTIONS AND COMMENTS

Questions relating to this announcement may be directed to the ODP Provider Qualification Unit at ra-odpproviderqual@pa.gov for Consolidated and Community Living Waiver providers. Adult Autism Waiver providers should send questions to ra-pwbasprovenroll@pa.gov.